

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

**DISABLED PATRIOTS OF AMERICA, INC.,
a Florida Not-For-Profit Corporation, and
BONNIE KRAMER, Individually,**

Plaintiffs,

V.

**TOWN & COUNTRY CHICAGO ASSOCIATES,
LLC, A Foreign Limited Liability Company,**

Defendant.

:
 : **Case No.: 1:07-cv-06362**
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 : **Joan H. Lefkow**
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 : **STIPULATED MOTION FOR**
 : **EXTENSION OF DISCOVERY**
 : **CUT-OFF DEADLINE**
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NOW COME THE PARTIES, and by and through respective undersigned counsel,
hereby file this Stipulated Motion For Extension of the cut-off deadline for non-expert discovery
and state as follows:

1. By Order dated January 16, 2008, [DE 13], this Court mandated that the cut-off deadline for non-expert discovery is May 28, 2008.
2. As of the date of this filing, by agreement, Defendant has not yet filed its Answer and/or Affirmative Defenses and has not provided answers to Plaintiffs first set of interrogatories or requests for production of documents. Nor has a R. 34 inspection of the premises been conducted.
3. Plaintiffs submit that a review of Defendant's initial discovery responses and Answer and observations made from the upcoming R. 34 inspection may provide cause for the submission of additional discovery requests upon Defendant.
4. Both parties agree that an extension of the applicable discovery deadline is in the

interest of judicial economy.

WHEREFORE, the parties respectfully request that this Court extend the non-expert

discovery deadline an additional 60 days to July 28, 2008.

Respectfully submitted,

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ORDER

APPROVED BY THE COURT this _____ day of _____, 2008, in Cook County, Chicago, Illinois.

JOHN HUMPHREY LEFKOW
United States District Judge